



**Lento Law Group, P.C.**  
3000 Atrium Way, Suite 200  
Mount Laurel, NJ 08054  
(856) 652-2000 x476 (T)  
(856) 375-1010 (F)  
Samuel D. Jackson, Esquire  
Member of the NJ Bar  
sdjackson@lentolawgroup.com

June 20, 2022

**Via: ECF**

Hon. Ann Marie Donio, U.S.M.J.  
United States District Court for the District of New Jersey  
Mitchell H. Cohen Building & U.S. Courthouse  
4th & Cooper Streets, Court Room 3B  
Camden, NJ 08101

Re: Gould, et al. v. Guida Dairy, et al.  
Docket No.: 1:22-cv-1861-NLH-AMD  
Adjournment Request for Motions Presently Returnable July 5, 2022

Your Honor:

I represent the Plaintiffs in the above-captioned matter. On May 23, 2022, the Defendants herein filed two motions: a Motion to Dismiss and a Motion to Strike Class Allegations (collectively, "Motions"). Those Motions were originally returnable on June 21, 2022, however, Plaintiffs' counsel sought an automatic extension pursuant to L.Civ.R. 7.1(d)(5), which adjourned the Motions to July 5, 2022.

Given that the Motions are currently returnable on July 5, 2022, Plaintiffs' opposition is presently due tomorrow, June 21, 2022. This presents a problem as, recently, one of the attorneys from Plaintiffs' firm primarily responsible for practice in the Federal Courts, abruptly departed from the firm for personal reasons. As such, an adjournment has become necessary. Plaintiffs propose that both Motions be heard on the next motion day, which is **July 18, 2022**. If the Court is amenable to this request, Plaintiffs' opposition papers and Defendants' replies would then be due on July 5, 2022, and July 11, 2022, respectively.

Finally, pursuant to my telephone conversation with opposing counsel today, June 20, 2022, Defendants' counsel has consented to this adjournment request.

I thank the Court for its kind consideration of this matter.

Respectfully,

A handwritten signature in black ink, appearing to read "Sam Jackson", with a long horizontal flourish extending to the right.

Samuel D. Jackson, Esquire

CC via email: Philip A. Goldstein: [pagoldstein@mcguirewoods.com](mailto:pagoldstein@mcguirewoods.com)